

2020 SECRETARY OF DEFENSE ENVIRONMENTAL AWARDS

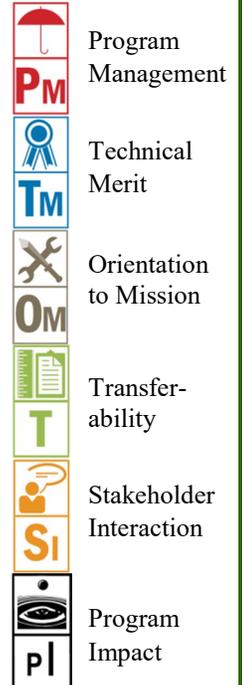
LOUISIANA ARMY NATIONAL GUARD ENVIRONMENTAL QUALITY, TEAM

The Louisiana Army National Guard (LAARNG) has established an effective new model for promoting compliance and guaranteeing environmental quality throughout the state. The Compliance Team, composed of three regional coordinators and three specialized environmental managers, has created the connectivity between operations on the ground and environmental leadership necessary to accomplish real operational change.

Across dozens of readiness centers, 16 maintenance facilities, and three major training sites, this team has achieved unmatched success in compliance for the state, completing the best Environmental Performance Assessment System (EPAS) inspection in LAARNG history in 2018.

The LAARNG Compliance Team:

Johnny Pickett, Northern Regional Coordinator	Ben Thomas, Compliance Branch Manager
Jeffery Carmouche, Central Regional Coordinator	Jonathon Watson, eMS Manager
Michael Majeau, Southern Regional Coordinator	Kelly Lejeune, Regional Coordinator Manager
Ali Merchant, Hazardous Waste Manager	Brad King, EPAS Manager



During the past two years, the Compliance Team has focused on establishing new protocols for communication and oversight that promote compliance. The team has formalized the roles and relationships for the Regional Coordinator (RC) model with a comprehensive protocol laying out weekly, monthly, quarterly, and annual responsibilities for the RCs. Their Environmental Regional Coordinator Playbook covers all aspects of compliance, from inspections to material handling, permit compliance to communication channels. Within this guidance document, the team has also formalized the relationships with unit Environmental Compliance Officers (ECO) and the training schedules the RCs complete for them.



In tandem with this guidance, the RCs use a comprehensive internal performance assessment system inspection checklist in their site visits that corresponds to the task areas within the playbook but is also customized to the particular site's needs. As an outcome of this groundwork, the team has been able to respond to compliance issues and anticipate and prevent them from happening.



As just one example, this year a potential leak risk involving legacy display equipment was identified and systematically addressed throughout the state. Last year, the team also established a Memorandum of Understanding (MOU) with a vendor to collect and recycle materials like fuel filters, oil, antifreeze, and petroleum products throughout the state, effectively eliminating these products from the state's waste streams.

The team integrates seamlessly with the larger compliance structures of the LAARNG. The RC manager is in daily contact with the RCs, and the team holds a monthly meeting on their own to



review progress on initiatives or any new guidance from the Environmental Program Manager or from LAARNG leadership. As the liaison between units and the Environmental Office, the RCs are also ideally positioned to raise any issues or innovations on the ground to leadership. The RCs inspection checklists function as tools driving the reporting and action items delivered to the cross-functional team (internal environmental staff, GIS branch, and resource branch) and the Environmental Quality Control Committee (EQCC), which includes representatives from the offices of Direct Reporting Unit (DRU), Safety, Public Affairs, JAG, Logistics, Joint Chiefs, and every other major directorate.

From the team's reporting, any action items and objectives identified in the EQCC quarterly meetings are subsequently presented to the Management Review Committee (MRC), a 15-person committee composed of the Chiefs of Staff, Senior Advisors, Commanders, and other key directorate leadership. With this structure, the team is fully embedded within the environmental decision-making processes and provide the inputs required for command-level environmental and compliance policy.



Externally, the team members coordinate with the Department of Environmental Quality (DEQ), the primary regulatory agency for the state, which conducts audits and inspections. Critically, each RC has been able to establish relationships with DEQ within their particular regions, so that those communications do not have to begin and end with the Environmental Office alone. The RCs are liaisons in this aspect as well, serving as the link between a shop or unit manager and the regulatory agency. Additionally, the RCs are directly involved in administering the LAARNG's nine wastewater discharge and three air permits.

Between these regulatory relationships and the team's own guidance documents, regulatory non-compliance has not been an issue for the LAARNG. The team is also essential in fully implementing the LAARNG's compliance-related management plans, including the Hazardous Waste, Solid Waste, Stormwater, and Waste Prevention management plans, eMS, and the Spill Prevention, Control, and Countermeasures (SPCC) plans. While these documents may originate with the Environmental Office, it is the team's role to ensure that Soldiers and staff throughout the state have the proper training and support to realize those plan goals and objectives operationally. They are also supporting the establishment of a Qualified Recycling Program by collecting and reporting recycling data on behalf of their units.

All of these efforts have helped to reduce costs for the LAARNG. Preventing compliance issues is, of course, much less expensive than treating them once they have emerged. The oversight of the RCs helps to ensure that the LAARNG facilities are properly managing materials and the processes of disposal and inventory. Establishing recycling rather than disposal of POL (oil and off-spec fuel) and antifreeze waste streams has also generated cost savings for the installation.



Cross Functional Team members, Jonathan Watson (eMS Mgr), Kevin Chapman (Conservation Mgr), Ben Thomas (Compliance Mgr), 1LT Brittley Caldwell (CFMO rep), and Kelly LeJeune (Regional Coordinator Mgr), discuss Internal EPAS findings before developing the quarterly report for the EQCC. The ENV office strives to ensure that ENV issues and concerns are communicated to commanders.



IPAS/EPAS: As the first line point of contact between unit and environmental, the RCs not only provide technical assistance, but also lead the onsite inspection processes, visiting all the sites in their regions on a schedule that reflects potential compliance risk and operational priority. Each of the LAARNG's three regions encompass between 20 and 25 facilities, including four to eight maintenance facilities, several readiness centers, and one training site each (Camp Minden, Camp Beauregard, and Camp Villere). The RCs visit each maintenance facility monthly and rotate through their rosters of readiness centers quarterly. The RCs are also able to coordinate their visits to dovetail with ECO training or certification needs. The team is currently redeveloping their checklist system to support mobile digital checklists that will automatically update environmental databases in real-time. With this digital capacity, the team will be able to even more easily identify any trends or root causes that may be causing compliance issues; automatic database connection would also help any future RCs to access the historic data connected to their facilities immediately.



As a result of the team's approach to IPAS, the LAARNG had its best EPAS inspection in 2018. In the course of supporting compliance, the team has gone above and beyond in making itself available to units needing support and encouraging transparent communication with the Environmental Office. Because the team is recognized as an asset that empowers units, Soldiers and staff are confident they can reach out for assistance no matter what the situation may be.



Incident Response and Proactive Prevention: An example of this cooperation and responsiveness arose last year in a series of small spill incidents, which ultimately lead to the proactive identification and correction of future leak risks. In one case, an emergency generator experienced a split fuel filter over a weekend, leaking diesel fuel as it ran. The unit immediately contacted their RC upon discovering the issue, and the generator was repaired and the fuel easily cleaned up following the site's SPCC. Shortly thereafter, a large vehicle at a fuel point collided with a guard pole, rupturing the 150-gallon fuel tank. This event, too, was able to be immediately addressed, with the unit ready to respond according to their SPCC training. The team was notified and able to provide support and oversight, as well as outreach to DEQ, to simplify the process for the unit.

Several weeks later, Jackson Barracks ECO reached out to their RC on a Saturday, noticing that an M60 tank on display at the training site museum appeared to have a fuel leak underneath it. When the RC responded, he discovered that the museum display, which had been in place some 15 years, had been installed with the equipment's battery, fuel filters, and other engine components still in place rather than drained and de-milled. Upon inspecting the other equipment displayed at the training site museum, it appeared that this was also the case with 12 other display items. The RC was



Environmental office personnel, Kelly LeJeune (RC mgr), Jeffery Carmouche (Central RC), and Mike Majeau (Southern RC), move a barrel of used absorbent to the proper location in the Waste Storage Area. Large maintenance facilities utilize these rooms to collect and prepare waste and recyclable materials for turn-ins. RCs ensure that personnel properly identify and label the contents to ensure proper disposal can be completed.

able to immediately connect with the team and roll out a response statewide to inspect and address any other display pieces at training sites and readiness centers, thus avoiding any future spill risks.

The team has been effective in finding other ways to simplify the operations and minimize risk throughout the LAARNG. Spill response supplies, hazardous waste materials, and other products used in shops, training sites, and readiness centers are managed centrally by the team within the Environmental Office. Those materials are then distributed by the RCs to ensure that oversight of facility materials continues in compliance with regulations and to give the RCs an opportunity to offer assistance or retraining as needed with those materials. Each RC has the institutional memory and site-specific knowledge to assess unique spill or material risks within their regions and alert their ECOs to areas that require special attention. The team assists their facilities with vendor coordination for wash rack and other equipment maintenance, repair of HVAC or other utility systems, and requests for material or equipment upgrades or substitutions.

eMS, Waste Reduction, and Recycling: The EQCC has identified hazardous waste reduction as a significant aspect for the installation eMS, and the team has prioritized these activities. As a result, during the past two years the team has significantly reduced, almost to the point of elimination, used oil and antifreeze products. The team developed an MOU with appropriate recyclers to recover and process these materials for resale. This recycling augments the waste reduction achieved by the installation from can puncturing devices and crushers, previously installed in the LAARNG's facilities to help units and shops recapture scrap metal. The team, especially the RCs, play a key role in coordination between vendors and facilities for pickup and properly staging materials. The vendor previously used in the central region has expanded coverage to the entire state, which has streamlined the processing requirements and oversight by the team. There is no cost for pick-up, eliminating disposal costs previously associated with this waste stream. Even the cost of storage containers has been avoided, with the vendor providing new 55-gallon drums whenever they complete a pick-up. With this recycling solution implemented statewide this year, the team has recaptured the following in FY19 alone:



FY	Location	Waste Material	Amount	Unit
2019	Gonzales	Used Oil	49	gallons
2019	Minden	Antifreeze	55	gallons
2019	Minden	Oil Filters	1	drums
2019	FMS 10	Used Oil	476	gallons
2019	CMF	Antifreeze	153	gallons
2019	CMF	Used Oil	1,149	gallons
2019	CMF	Oil Filters	11	drums
2019	Villere	Used Oil	751	gallons
2019	FMS 7	Used Oil	736	gallons
2019	JB	Used Oil	338	gallons
		Used Oil	3,499	gallons
		Antifreeze	208	gallons
		Oil Filters	12	drums



EQCC: One of the great benefits of the team’s structure within the Environmental Office and the LAARNG is that it incorporates communication and accountability at every level. With completion of the shop inspection checklist each month, the RCs are able to identify where a shop may have made an error, versus where it may have an issue, and then escalate that concern to the team’s managers and ultimately the EQCC. In some cases, the issue may be something that the team is not empowered to address--but likely an EQCC member can. And if the EQCC cannot resolve an issue, the MRC is on hand to provide top-level guidance. The attention to environmental compliance is thus fully integrated in every directorate, and responses are based on real data. The checklist process also helps the team identify good actors or shops that are going above and beyond, so that those personnel can be recognized and their best practices implemented elsewhere.



Northern Regional Coordinator, Johnny Pickett, conducts monthly Sewage Treatment Plant (STP) NPDES samples. Johnny Pickett ensures STP samples are collected monthly as well as the monitoring and testing of more than 200 wells on Camp Minden.

Water Resource Protection and Monitoring: At Camp Minden, the team helps manage a unique challenge, a CERCLA Superfund site with an extensive requirement for water sampling and a Louisiana Pollution Discharge Elimination System permit. The RC for the northern region is the point person in maintaining compliance on this site, collecting water samples, reviewing the lab reports, and overseeing DEQ reporting. In total, the site encompasses 211 monitoring wells in the 30-year sampling program. The team works with the US Army Corps of Engineers and contractor teams addressing the site cleanup efforts, in addition to conducting the quarterly sampling. As liaisons with the cleanup team, the Compliance Team ensures that contractors are completing their roles as required, and also assisted the state Department of Health in conducting their site assessments. Lead, copper, and PFAS sampling are conducted at three active drinking water wells for the Department of Health. This year, as the five-year contract option arose for the site remediation, the RC was called upon to go above and beyond, responding to 30 potential contractors’ questions about the site, providing details on the site history, and assisting with other information to facilitate the bidding process.

The team has proven to be the cornerstone of the LAARNG’s environmental compliance, streamlining or

eliminating the regulatory burdens for units and developing even more efficiency in operations. They have been integral to achieving the LAARNG’s larger environmental goals and promoting an ethic of stewardship and awareness throughout the organization and throughout the state. The team’s implementation of environmental plans is exceptionally successful because they have established the relationships with Soldiers and staff who must apply those guidelines in their day-to-day work. Empowering ECOs to guide operations within their facilities has helped to embed accountability for compliance from the bottom up.



The team has implemented a comprehensive training program, both in terms of formal certification and informal instruction during its regular site visits. At the same time, the team also

supports the rest of the Environmental Office in meeting their mandates. The RCs, for example, collect the product inventory and disposal data on behalf of the LAARNG hazardous material manager. They collect the recycling and diversion information for the Solid Waste Manager.

Whenever trainers need to site a training that will involve ground disturbance, the team is their first contact for support in triggering the NEPA checklist. The RCs will liaise with the LAARNG's NEPA Manager on the trainers' behalf. The RCs are also in a position to notify the NEPA Manager about smaller projects that may be arising without the Environmental Office awareness. In this way, the team has dramatically eliminated the potential for projects to slip through the compliance oversight net. This is particularly relevant at training sites like Camp Minden, where many buildings are more than 50 years old. The team also coordinates with the Cultural Resources Manager at the Environmental Office on behalf of the training site's offices.

At Readiness Centers, the team tailors its support to the particular battalions or brigades located at the site. The team emphasizes standardization for compliance in the readiness centers as a guard against high rates of turnover; relationships and training of ECOs at those facilities are always a team priority. With this in mind, the team has launched a new web-based initial training and recertification module for ECOs.

Providing effective training is a key function for the team, representing a core element of their outreach with their stakeholders as well as a model for other state Guards to follow. The team provides initial ECO certification via the LAARNG Environmental Compliance Officer training course on-site within six months after their appointment date and an annual refresher thereafter. The ECO obtains annual recertification via on-line SRMS website training; their training includes annual SPCC modules. The team is now creating a mandatory digital training

maintenance system that will automatically flag training modules appropriate to each battalion or shop site. Once this system is launched, it will be integrated into the broader mandatory training system of the LAARNG and allow for the capture of all environmental training certifications within that system.

The team is taking the lead within the Guard on developing a mobile EPAS checklist tool, building on the existing framework they have created between the RC playbook and the customized checklists deployed in each region. While all the checklist data is currently captured in hard copy and uploaded to environmental database records, the mobile tool will allow for immediate data capture. In the meantime, the team collates its checklist data to generate after action reports for the facilities and for sharing with the cross-functional team or EQCC.

To best serve their stakeholders, the facilities they serve and the DEQ or other regulatory agencies, the team has also created environmental books for every LAARNG shop. The binder contains all documentation an ECO will need in the



Southern Regional Coordinator, Mike Majeau, covers the waste protocol sheets with the facility ECO during an inspection of the Unit Training Equipment Site-Villere. Boards like this have become a focal point at larger maintenance facilities to provide information to all personnel in the shops to ensure compliance with LANG procedures and ENV regulations.

event of a DEQ inspection, to include three years' worth of training records, hazardous waste manifests, permits, certifications, or any other specialized information unique to a particular site. This book enables ECOs to easily respond to any request by a regulator. On any site visit, the RC will begin with a review of the environmental binder and update it with any new information generated by the inspection. The team also maintains a page on the environmental website for each facility, recording all permits, reports, and analytics associated with the location.

The structure the team has achieved is another highly transferable element of the LAARNG's environmental quality program. Creating the flow from Environmental Office to RC to unit has proven to be incredibly effective, promoting transparency and organization-wide buy-in on environmental objectives. In every respect, the team has protected the LAARNG's record of compliance and, by extension, its uninterrupted operations.